

From: [Ken Merrill](#)
To: [Bray, Dave](#)
Subject: RE: Ecology's Draft Response to Comments for Ponderay Newsprint Company
Date: Wednesday, March 22, 2017 10:33:50 AM
Attachments: [removed.txt](#)

Thanks David. Sorry to hear you've been ill. I will need to read more about the HAP stuff again.

--Ken

Ken Merrill

Water Resources Program

(509) 447-7276 (office)

(b) (6)

KNRD-color



From: Bray, Dave [mailto:Bray.Dave@epa.gov]
Sent: Tuesday, March 21, 2017 7:09 PM
To: Ken Merrill
Subject: RE: Ecology's Draft Response to Comments for Ponderay Newsprint Company
Hi Ken,

Sorry that it's taken me a few days to get back to you – (b) (6) hope to get back into the office tomorrow (trying to get through my backlog of emails before I go in). The response from Ecology is basically correct, even if they did cite to the wrong Ecology rule – should have been WAC 173-400-720(4)(a)(6); 173-400-820 applies to major sources located in nonattainment areas.

This is one of the things that makes implementation of the Clean Air Act so complicated – Congress defines the term “major stationary source” differently for different programs such as PSD, nonattainment NSR, Title V, and the hazardous air pollutant program. One of the things that differs is whether you count fugitives or not when determining a source's potential to emit. Fugitive emissions of HAPs are always counted for the HAP program so all methanol emissions from this source need to be included when determining its HAP PTE. However, no fugitive emissions can be counted to determine whether this source is a major source for PSD purposes so methanol emissions would be included in the calculation of the source's VOC PTE only if they come out of a stack or other equivalent opening in a structure. To make it even more complicated, fugitive emissions do have to be counted for PSD purposes for some source categories (there's a list in EPA's and Ecology's rules). For example, if this was a kraft pulp mill rather than a thermo-mechanical pulp mill, it would have to count the fugitive methanol emissions for PSD purposes.

So the situation that Ecology describes in its response is a real possibility – that the waste water treatment plant has both fugitive and non-fugitive methanol (VOC) emissions that get counted differently for PSD applicability purposes and HAP applicability purposes.

Hope this helps and let me know if you have any additional questions.

Dave

David C. Bray

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From: Ken Merrill [<mailto:kmerrill@kalispeltribe.com>]

Sent: Friday, March 17, 2017 8:53 AM

To: Bray, Dave <Bray.Dave@epa.gov>

Subject: FW: Ecology's Draft Response to Comments for Ponderay Newsprint Company

Hi David,

Not sure I believe their explanation in Response #4 about the major source determination and consistency with the CAA PSD program. Can you or your staff explain how this works better to us?

Thanks --Ken

Ken Merrill

Water Resources Program

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KNRD-color



From: Wood, Karen K. (ECY) [<mailto:KWOO461@ECY.WA.GOV>]

Sent: Thursday, March 16, 2017 3:05 PM

To: Ken Merrill

Cc: Filipy, Jenny (ECY)

Subject: Ecology's Draft Response to Comments for Ponderay Newsprint Company

Hi Ken- This is mostly what I want to talk about....

From: Filipy, Jenny (ECY)

Sent: Thursday, March 16, 2017 2:16 PM

To: Wood, Karen K. (ECY) <KWOO461@ECY.WA.GOV>

Subject: FW: Ecology's Draft Response to Comments for Ponderay Newsprint Company

Please see the attached Draft Response to Comments for Ponderay Newsprint Company.

Thanks!

Jenny Filipy, PE

Environmental Engineer - Air Quality

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